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# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### WASTE DIVISION

#### Office of Environmental Response and Remediation

SEP 15 1993

NOTED SEP 23 1993 B.M.M.

Chris Chambers  
Division of Engineering Design, Department of Public Works  
City of Norfolk  
700 City Hall Building  
Norfolk, VA 23501

Subject: Norfolk Gas Plant, at Monticello Avenue and Virginia  
Beach Boulevard, Norfolk, Virginia (VRP-00097)

Dear Mr. Chambers:

This letter is a response to your request, on behalf of the City of Norfolk, to construct an asphalt parking lot on all or part of the former Norfolk Gas Plant site. It is our understanding that the City of Norfolk wishes to begin the proposed construction prior to entering into a Compliance Agreement within the Virginia Remediation Program (VRP). A Compliance Agreement would establish a formal relationship between the Department of Environmental Quality and the responsible parties for this site, and would outline a procedure for addressing contamination at the site.

This Office has no objection to your request. However, any activity on this site prior to entering into a Compliance Agreement represents an interim action. This Office cannot guarantee that specific interim actions or their results will not be disturbed by the corrective measures ultimately determined to be appropriate for this site.

This Office is currently finalizing a general Consent Agreement format that will be tailored for each site within the VRP. As this Office has earlier indicated, the Norfolk Gas site is at the top of the list of VRP sites to receive attention, and this Office anticipates completion of a draft Consent Agreement for the Norfolk Gas site in the near future. While this format is being finalized, this Office looks to receive two items from you:

- Sufficient evidence that the extent, magnitude, and nature of contamination at the site has been fully characterized; and
- A Corrective Measures Study report that proposes a remedial plan.

The first item, full characterization of the site, is already well under way. Nonetheless, while many data have previously been generated, they are presented in a variety of documents that cannot be readily assessed in aggregate. Completion of the site characterization task may involve some new data gathering, but should primarily involve coalescing the existing data into a unified format. Of interest are data for all contaminants in all media, and their variation throughout the site over time. Particular attention should be paid to delineation of the lateral and vertical extent of groundwater contamination. Concentrations for all relevant media should be reported on a total basis, with concentrations from TCLP or other analyses reported as appropriate.

The second item, a Corrective Measures Study (CMS) report, should be designed to follow the format outlined in §4.4.C.4 and §4.4.C.5 of the Virginia Solid Waste Management Regulations, Amendment 1, March 15, 1993. The CMS report should contain four key components:

- An analysis of all potentially viable remedial actions for the site (§4.4.C.4.d.2);
- A recommendation and schedule of the most appropriate remedy for the site (§4.4.C.5, §4.4.C.6);
- A recommendation and justification of remedy standards (§4.4.C.5.a); and
- A description of how the proposed remedy will meet the proposed remedy standards (§4.4.C.4.d.2)

The CMS report would begin much like your existing document entitled *A Preliminary Feasibility Study for the Norfolk Gas Plant*, prepared by Geraghty and Miller, Inc., in September 1992. However, in addition to the assessment of potential remedial actions and recommendation of the most appropriate remedial action, the CMS report should recommend standards to be applied to the remedial action (i.e., acceptable contaminant levels). As required under §4.6, the proposed remedy standards must be protective of human health and the environment. A significant amount of this work has been previously performed in your existing document entitled *A Site Assessment and Risk Evaluation of the Norfolk Gas Plant Site*, prepared by Geraghty and Miller, Inc., in July 1990. The fundamental objective of the CMS report, as with the site characterization, should be to coalesce all relevant information, both existing and new, into a single

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document that is consistent with the current regulatory requirements cited above.

Entry into the Consent Agreement is not contingent upon prior receipt and review of either the complete site characterization or the CMS report. However, they will be required as part of the Consent Agreement, and their timely completion will significantly advance the process of agreeing upon the appropriate remedial action for this site once a Consent Agreement is signed.

If you have any questions or concerns, please feel free to call me at 804/527-5332.

Sincerely,



Kevin McCarthy  
Remediation Specialist  
Remediation Section

Copies: Mike Kadlubowski, Virginia, Power  
VRP File (VRP-00097-001)  
Chron. File